



Small Business & Local Government Assistance Metal Finishers Compliance Checklist

Company Information	__1 st visit	__2 nd visit	__3 rd visit	__Other	Site Visit Date: _____
Company Name			Facility Contact		
Mailing Address			Physical Address		
			County		
Owner's Name			Business Phone		
Date of Construction			Primary SIC		
Start of Operation			Secondary SIC		
Latitude			Longitude		

IMPORTANT NOTE: Compliance related questions are denoted with a checkmark (✓). Answering “no” to a question with a checkmark may mean the facility is out of compliance with state or federal environmental rules.

Air Regulations – Authorizations can be obtained in one of three ways:

- Permit by Rule (pbr)
- Standard Permit
- New Source Review (NSR) Permit

		Yes	No	N/A
1	Does this facility have an air account number? If yes, Account No. _____			
2✓	Does this facility have an air permit? If yes, Permit No. _____			
3✓	If yes: Does the facility comply with all permit conditions? (Use comments section)			
4✓	Does the facility claim a permit by Rule (PBR)?			
5	If yes, Does the facility meet all requirements of the PBR(s) claimed? See Below			
	✓ <input type="checkbox"/> 106.227 – Soldering, Brazing & Welding			
	✓ <input type="checkbox"/> 106.262 – Facilities			
	✓ <input type="checkbox"/> 106.265 - Hand-held and Manually Operated Machines			
	✓ <input type="checkbox"/> 106.375 – Aqueous Solutions for Electrolytic and Electroless Plating			
	✓ <input type="checkbox"/> 106.376 – Decorative Chrome Plating			
	✓ <input type="checkbox"/> 106.431 – Milling and Grinding			
	✓ <input type="checkbox"/> 106.432 – Dipping Tanks and Containers			
	✓ <input type="checkbox"/> 106.433 – Surface Coating Facilities			
	✓ <input type="checkbox"/> 106.434 – Powder Coating Facility			
	✓ <input type="checkbox"/> 106.452 – Dry Abrasive Blasting			
	✓ <input type="checkbox"/> 106.454 – Degreasing Units			
	✓ <input type="checkbox"/> 106.472 – Organic and Inorganic Liquid Loading and Unloading			
	✓ <input type="checkbox"/> 106.473 – Organic Liquid Loading and Unloading			
	✓ <input type="checkbox"/> 106.532 – Water and Wastewater Treatment			
	✓ <input type="checkbox"/> Other/Previous PBR: _____			
	✓ <input type="checkbox"/> Other/Previous PBR: _____			
	✓ <input type="checkbox"/> Other/Previous PBR: _____			
6✓	Does the facility maintain records that demonstrate compliance as required by 30 TAC 106.8 for all PBRs?			
7✓	Does the facility avoid being a nuisance (noise, dust, odor, etc)?			
8	Is the facility a major source?			
9✓	If so, does the facility have a federal operating permits?			
10	Do the National Emission Standards for Hazardous air Pollutants (NESHAP) for Chrome Plating			

	and Chrome Anodizing apply to this facility?			
11	If yes,			
	a. ✓ Does the facility meet required emission limits?			
	b. ✓ Does the facility follow required work practice standards?			
	c. ✓ Has the facility completed its initial emission testing if required?			
	d. ✓ Does the facility conduct required monitoring of emission controls?			
	e. ✓ Does the facility keep records to document compliance for 5 years?			
12	f. ✓ Does the facility submit reports to EPA as required?			
	Does the facility use:			
	a. trichloroethylene			
	b. methylene chloride			
	c. perchloroethylene			
	d. chloroform			
13	e. 1,1,1,-trichloroethane			
	f. carbon tetrachloride			
	If yes, then the NESHAP for Solvent Degreasing Units applies.			
	a. For batch vapor and in-line cleaning machines:			
	i. ✓ Does the facility meet the overall emission limit or the equipment standard for each machine?			
13	ii. ✓ if the equipment standard is used, does the facility also meet basic design, work practice, and operator test requirements?			
	b. for batch cold cleaning machines			
	i. ✓ Does the facility comply with equipment control and work practice requirements for each machine?			

Air Regulations (Chapter 115 Regulations)

In addition to any other requirements, coating, solvent using, and degreasing processes in the following counties must meet the requirements outlined in this section.

Beaumont/Port Arthur Area		Dallas/Ft. Worth Area		Houston/Galveston Area		El Paso Area	Other
Hardin	Orange	Collin	Denton	Brazoria	Harris	El Paso	Gregg Nueces Victoria
Jefferson		Dallas	Tarrant	Chambers	Liberty		
				Fort Bend	Montgomery		
				Galveston	Waller		

Air Regulations (Federal and 30 TAC 115 Requirements)		Yes	No	N/A
14✓	Does the facility have daily usage records to demonstrate that it meets the 3 lb/hr and 15 lb/24 hrs emission limit?			
15✓	If degreasing is done at the facility, does the facility meet all applicable requirements of Subchapter E: Solvent-Using Processes, Degreasing Process?			
16✓	If surface coating is done at the facility, does the facility meet all applicable requirements of Subchapter E: Solvent-Using Processes, Surface Coating Processes?			
17✓	Does the facility keep recommended hourly records of coating and solvent usages?			

Air Regulations (Chapter 101) – Emission, Maintenance, Start-up, Shutdown

Non Attainment Areas			Early Action Compact Areas		Maintenance Area	Other Areas
Brazoria	Chambers	Collin	Bastrop	Bexar	Victoria	Nueces San Patricio
Dallas	Denton	El Paso	Caldwell	Comal		
Ellis	Ft. Bend	Galveston	Gregg	Guadalupe		
Hardin	Harris	Jefferson	Harrison	Hays		
Johnson	Kaufman	Liberty	Rusk	Smith		
Montgomery	Orange	Parker	Travis	Upshur		
Rockwall	Tarrant	Waller	Williamson	Wilson		

Air Regulations (Chapter 110)		Yes	No	N/A
18✓	Does the facility track all reportable and non-reportable emission events and report them to TCEQ by March 31 of each year? (101.201)			
19✓	Does the facility track all reportable and non-reportable scheduled maintenance, start-up, and shut-down activities and report them to TCEQ by March 31 of each year? (101.211)			

20✓	Are all records maintained for a minimum of 5 years?											
Waste Regulations (General Requirements)		Yes	No	N/A								
21✓	Has the facility performed a hazardous waste determination on all solid waste streams?											
22✓	Does the facility maintain documentation to support all hazardous waste determinations?											
23✓	Does the facility have records of monthly waste generation to support its claimed generator status? Indicated the generator status claimed.											
	<table border="0" style="width:100%"> <tr> <td style="width:50%"><u>Generator Status</u></td> <td style="width:50%"><u>Accumulation Time/Accumulation Quantity</u></td> </tr> <tr> <td><input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) up to 220lbs.....</td> <td>No limit/2,200 lbs or less</td> </tr> <tr> <td><input type="checkbox"/> Small Quantity Generator (SQG) 220lbs to 2,200 lbs.....</td> <td>180 days or less¹/13,200 lbs or less</td> </tr> <tr> <td><input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....</td> <td>90 days or less/no limit</td> </tr> </table> <p>¹ Can be extended to 270 days if the generator must transport waste 200 miles or more.</p>	<u>Generator Status</u>	<u>Accumulation Time/Accumulation Quantity</u>	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG) up to 220lbs.....	No limit/2,200 lbs or less	<input type="checkbox"/> Small Quantity Generator (SQG) 220lbs to 2,200 lbs.....	180 days or less ¹ /13,200 lbs or less	<input type="checkbox"/> Large Quantity Generator (LQG) over 2,200 lbs.....	90 days or less/no limit			
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24✓	Is this facility registered with the TCEQ as a hazardous waste generator? (not required for CESQG) TCEQ Registration No. _____ EPA ID _____											
25	Is the facility and industrial waste generator?											
26	If yes, is all non-hazardous waste classified as Class 1, Class 2, Class 3?											
27✓	If this facility generates greater than 220lbs of Class 1 waste are they registered with the TCEQ (Only required if not already registered as a SQG or LQG)											
28✓	Is the facility's Notice of Registration (NOR) up to date, including all waste streams and waste management units? (Not required for CESQG)											
29✓	Has the facility submitted an Annual Waste Summary each year? (Not required for CESQG)											
30✓	Does the facility fulfill all other recordkeeping and reporting requirements for its generator status?											
Waste Regulations (On-Site Accumulations Requirements)		Yes	No	N/A								
31✓	Does the facility comply with appropriate accumulation time requirements?											
32✓	Does the facility comply with appropriate accumulation quantity requirements?											
33	Is hazardous waste accumulated in tanks at the facility?											
34	a. ✓ Has the tank system's integrity been assessed and certified by an independent, qualified, registered professional engineer? (LQG only)											
	b. ✓ Are tanks labeled with the words hazardous waste?											
	c. ✓ Are records kept of daily tank inspections?											
	d. ✓ Do tanks have a secondary containment system designed to contain 100% of the largest tank within its boundaries? (LQG only – 40 CFR 265.193(e))											
	e. ✓ If yes, is the secondary containment either designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system or have sufficient excess capacity to contain run-on or infiltration of precipitation from a 25 year 24 hour rainfall event? (LQG only – 40 CFR 265.193(e))											
35	Is hazardous waste accumulated in container storage areas at the facility?											
36✓	If Yes: Are waste containers labeled, dated, closed, and compatible with their contents? (Compliant for LQG and SQG Only, although CESQG may want to adhere to also)											
37	If the facility is a SQG or LQG:											
	a. ✓ Does the facility conduct weekly container inspections?											
	b. ✓ Does the facility document weekly container inspections?											
	c. ✓ Have employees been trained in the handling of hazardous waste, with regards to their job duties?											
	d. ✓ Has an emergency response coordinator and alternative been designated, available 24 hours a day to responds to on-site spills and accidents?											
	e. ✓ Have emergency number been posted by the telephone at the facility?											
38	Is hazardous waste accumulated in satellite accumulation areas at the facility?											
39	If yes: (required by SQG and LQG)											
	a. ✓ Are waste containers labeled, closed and compatible with their contents?											
	b. ✓ Is the amount of accumulated waste at each satellite accumulation point less than 55 gallons (or 1 quarter of acutely hazardous waste)?											
	c. ✓ Is waste from the satellite area moved to a waste management unit within 3 days once the 55 gallon limit (or 1 quart of acutely hazardous waste) is exceeded?											
	d. ✓ Is the location of the satellite accumulation area documented?											
40✓	Have all on-site and off-site hazardous waste recycling activities been registered with the TCEQ? (entered on NOR or TCEQ 0525, SQG and LQG only)											
41✓	If hazardous waste it treated, stored, or disposed of on-site, has the facility compiled a waste analysis plan (WAP) or obtained a permit for that activity?											
Waste Regulations (Transportation & Disposal Requirements)		Yes	No	N/A								

42✓	Does the facility use a TCEQ/EPA registered transporter? (CESQGs may transport their own waste, without a manifest, to an authorized disposal facility)			
43✓	Does the facility use a TCEQ/EPA permitted treatment, storage, disposal (TSD) facility?			
44✓	Does the facility manifest all hazardous and Class I waste that is transported? (SQG, LQG, & CESQGs that generate more than 220lbs of Class I waste. Class I waste sent for recycling does not require a manifest.)			
45✓	Does the facility have copies of manifests (green & white) for the last 3 years? (SQG & LQG only)			
46✓	Does the facility have Land Disposal Restriction (LDR) certification statements per waste stream and disposal facility for the last 3 years? (SQG & LQG only)			
Universal Waste Regulations		Yes	No	N/A
47	Does the facility currently manage any of its hazardous waste streams as “universal waste”?			
48✓	If yes: Are the waste streams appropriately classified and eligible for coverage under the universal waste rule?			
49✓	Are all containers holding universal waste properly labeled per 30 TAC 335.261?			
50✓	Are containers kept closed?			
51✓	Are all universal waste streams shipped to a Treatment, Storage Disposal (TSD) facility or universal waste handler within 1 year of their initial generation date?			
52✓	If not, does the facility have appropriate documentation on hand to show that an extended time limit is needed to facilitate proper recovery, treatment or disposal?			
53✓	If the facility is a Large Quantity Handler of universal waste, are all universal waste shipments accompanied by a bill of lading or other shipping document?			
54✓	Does the facility use a TCEQ/EPA permitted recycling or TSD facility?			
Discharge to Publicly Owned Treatment Works (POTW) (Sanitary Sewer System)		Yes	No	N/A
55	Does the facility discharge process wastewater to the sewer system?			
56	If yes, has the facility obtained permission from the POTW to discharge process wastewater?			
57	a. If the POTW has an approved pretreatment program, does the facility have a permit to discharge process wastewater to the POTW			
	b. Does the facility comply with the requirements of this permit? If this question is not applicable move on to question 55.			
58	If the POTW does not have an approved pretreatment program, a. Is the facility a categorical industrial user subject to the requirements of any category in 40 CFR Parts 405 – 471?			
	b. ✓If yes, does the facility submit monitoring reports to the TCEQ each June and December?			
	c. ✓ If no, the facility may be required to submit semi-annual monitoring reports to the TCEQ if it is a significant non-categorical industrial user. It is also recommended that the facility contact the city and inform them of the nature of their discharge.			
Discharges to Water in the State		Yes	No	N/A
59	Does the facility discharge wastewater into surface water (via run-off, storm drains, rivers creeks, dry waterways etc)?			
60✓	If yes, does the facility have a Texas Pollutant Discharge Elimination System (TPDES) Permit?			
61	a. ✓ If yes, does the facility meet the daily average flow from each outfall?			
	b. ✓ Does the facility meet the daily maximum flow from each outfall?			
	c. ✓ Does the facility meet the discharge limitation for each constituent?			
	d. ✓ Does the facility conduct monitoring & sampling as required by their discharge permit?			
	e. ✓ Does the facility submit discharge monitoring reports (DMRs) as required by their permit?			
	f. ✓ Does the facility submit non-compliance reports as required by 20 CFR 122.41 & 30 TAC 305.125?			
	g. ✓ Does the facility’s TPDES wastewater permit discharge permit include storm water discharges? If yes, skip questions 65 – 69.			
	h. ✓ Is the facility in compliance with storm water discharge requirements listed in their TPDES wastewater discharge permit?			
62	Does the facility dispose of wastewater adjacent to surface water (by irrigation, evaporation pond, subsurface injection, or another approved method)?			
63✓	If yes, does the facility have a Texas Land Application Permit? (Note: if hazardous or Class I industrial waste is being disposed of, then multiple other regulations apply.)			
64✓	Discharges to on-site septic facilities Does the facility avoid discharging any process wastewater to a septic system?			

(Note: on-site septic systems can only be used for domestic sewage)		Yes	No	N/A
Storm Water Discharges				
65✓	Does the facility have coverage under the Multi-Sector General Permit (MSGP) for discharges from Industrial Activities or the No Exposure Certification (NEC)?			
For facilities covered under the MSGP for Discharges from Industrial Activities				
66✓	Has the facility developed and implemented a Storm Water Pollution Prevention Plan (SWP3)?			
67✓	Does the facility adhere to the SWP3 requirements outlined in the MSGP?			
68	Does the facility follow the sampling, monitoring, and reporting requirements outlined in the MSGP?			
	a. ✓ Annual Hazardous Metal Monitoring? (facilities can opt out of all or part of this requirement if they meet certain requirements)			
	b. ✓ Quarterly Visual Monitoring? (applies to all facilities)			
	c. ✓ Quarterly Analytical Monitoring aka Benchmarks? (twice per year) (facilities in Sectors I, P, R, V, W, X, Z, AB, AC, AD do not have benchmark requirements)			
	d. ✓ Sector Specific Numeric Effluent Limitation Monitoring? (applies to Sectors A, C, D, E, J, O only)			
	e. ✓ Quarterly facility inspections? (applies to all facilities)			
	f. ✓ Does the facility maintain and update records as required?			
	g. ✓ Does the facility submit DMRs to the TCEQ by March 31 of each for annual hazardous metals, benchmarks and sector-specific effluent limits?			
	h. ✓ Does the facility maintain a rain gauge on-site or utilize one in the immediate vicinity of the site?			
	i. ✓ Does the facility, at a minimum monitor the rain gauge once per week, and once per day during a rain event,?			
	j. ✓ Does the facility maintain a log for their rain gauge monitoring?			
For facilities covered under the NEC?				
69✓	Is the facility meeting the requirements of the No Exposure Certification?			
Other Requirements		Yes	No	N/A
70	Does the facility comply with the Texas Department of Health's requirements for Tier II?			
71	Is the facility subject to the Waste Reduction Policy Act (WRPA)?			
72	If yes,			
	a. ✓ Has a Source Reduction Waste Minimization Plan (SR/WM) been developed? (SQGs, LQGs, and TRI reporters submit once every 5 years)			
	b. ✓ Has an Executive Summary of the SR/WM Plan and a Certificate of Completeness and Correctness been submitted? (SQGs, LQGs and TRI reporters only)			
	c. ✓ Has an Annual Progress Report been submitted? (SQGs, LQGs and TRI reporters only)			
73✓	Does the facility have Material Safety Data Sheets (MSDS) or other information for all chemicals used in the past 24 months?			
74	Is there any evidence of spills?			
75✓	If, yes Has the facility taken appropriate reporting and abatement actions?			
76✓	Does the facility practice good housekeeping?			

Comments:

This checklist is for guidance purposes only. It is not a substitute for the rules and regulations. The Small Business & Local Government Assistance (SBLGA) Program is an independent section, separate from enforcement of the Texas Commission on Environmental Quality (TCEQ). Contact SBLGA on their toll-free hotline (800) 447-2827 or on the internet at www.sblga.info